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Attorneys for Non-party
Juniper Networks, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

11	CISCO SYSTEMS, INC.,)	Case No. 5:14-cv-05344-BLF (PSG)
12	Plaintiff,)	
13	v.)	DECLARATION OF JOSHUA GLUCOFT
14	ARISTA NETWORKS, INC.,)	ON BEHALF OF NONPARTY JUNIPER
15	Defendant.)	NETWORKS, INC. IN SUPPORT OF
16)	ARISTA NETWORKS, INC.'S
17)	ADMINISTRATIVE MOTION TO FILE
18)	DOCUMENTS UNDER SEAL (DKT. NO.
19)	378)
20)	Judge: Hon. Beth Labson Freeman
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22)	
23)	
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26)	
27)	
28)	

DECLARATION OF JOSHUA GLUCOFT

I, Joshua Glucoft, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for non-party Juniper Networks, Inc. (“Juniper”) with respect to the third-party subpoena served by defendant Arista Networks, Inc. (“Arista”) in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. Where expressly indicated, I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Arista’s Administrative Motion to File Documents Under Seal (Docket No. 378), which moves the Court for an order to file under seal the following item related to non-party Juniper:

- Certain redacted portions of Arista’s Opposition to Cisco’s Motion for Partial Summary Judgment (the “Opposition”);
- Certain redacted portions of the Declaration of John R. Black Jr. in support of the Opposition;
- Certain redacted portions of the Declaration of William M. Seifert in support of the Opposition; and
- Exhibit 38 to the Declaration of Ryan Wong in support of the Opposition (excerpts from the deposition of Philip Kasten).

3. In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule 79-5 and provide additional facts in support of Cisco’s Administrative Motion to File Documents Under Seal to the extent that the administrative motion pertains to Juniper.

4. The redacted portions of the Opposition and the exhibits described above contain direct quotes and references to the transcript of the deposition of Philip Kasten as Juniper’s corporate designee pursuant to a subpoena served on Juniper by Arista. The transcript reflects substantive discussion of the technical underpinnings and development of Juniper’s highly proprietary software—which contains much information that Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of its source code architecture and

1 development, including, for example, implementing strict screening procedures for visitors to its
2 engineering campus. Public disclosure of essential nonpublic facts about Juniper's software could
3 materially impair Juniper's intellectual property rights and could cause serious competitive
4 consequences to Juniper's business positioning.

5 5. For these reasons, there are compelling reasons to seal the redacted portions of the
6 exhibits described above.

7 Executed on July 15, 2016, at Los Angeles, California.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct to the best of my knowledge.

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11 /s/ Joshua Glucoft

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